

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

JESSICA HODGES, as natural guardian of)
minor children, LMC and DLC; ESTATE)
OF LEE MICHAEL CREELY by and)
through Warren Ratchford, its Administrator,)
)
Plaintiffs,)
)
vs.)
)
CHATHAM COUNTY, GEORGIA;) CASE NO. 4:22-cv-00067-WTM-CLR
CORRECTHEALTH LLC;)
CORRECTHEALTH CHATHAM, LLC;)
CARLO MUSSO, MD; KAREN)
FORCHETTE; ALFRED NEVELS;)
SELENA CARDONA; TEANNA)
FRANCES-HENDERSON; TERENCE)
JACKSON; DON WHITE; KARLOS)
MANNING; YVETTE BETHEL-)
QUINNEY; LOWRETTA FLORENCE;)
AMBER ANDERSON; JACKIE HARNED;)
SUSAN RIVERA; and LOUIKISHA)
ROBERTS,)
)
Defendants.)

SECOND JOINT MOTION TO EXTEND DISCOVERY DEADLINES

COME NOW all parties to the above-captioned matter and, by and through their counsel, jointly request that the current deadlines in this Court's Scheduling Order entered August 23, 2022, be extended as noted below. In support, the parties respectfully show this Court the following:

1. On April 14, 2022, the parties submitted a proposed scheduling order. *Doc. 24.* On February 3, 2020, this Court issued its first Scheduling Order. *Doc. 28.*

2. On August 22, 2022, the parties jointly requested that the first Scheduling Order be amended to extend several deadlines. *Doc. 48.* That request was granted by this Court on August 23, 2022. *Doc. 50.*
3. As stated in the parties' first Joint Motion to Extend Discovery Deadlines, this case involves important constitutional issues and the untimely death of Lee Creely at the Chatham County Detention Center.
4. The parties have diligently pursued discovery since this action was initiated. And, in the time since deadlines were first extended in August, the parties (and experts) have toured the jail and fourteen depositions have been completed (in addition to the parties continuing to engage in written discovery and nonparty document discovery). The depositions included Plaintiff Jessica Hodges, three members of Plaintiff and Lee Creely's family, and ten named Defendants.
5. However, an additional eighteen depositions of either party defendants or critical fact witnesses have been scheduled or are in the process of being scheduled.
6. So, despite the parties' best efforts and consistent coordination, additional fact discovery remains. The parties would therefore be assisted by this Court amending the Scheduling Order to provide the parties with additional time to complete discovery.
7. To that end, the parties propose the following deadlines:
 - Last Day to Conduct Fact Discovery: **December 15, 2022**
 - Last Day to Furnish Expert Witness Reports by Plaintiff: **January 31, 2023**
 - Last Day to Furnish Expert Witness Reports by Defendants: **February 15, 2023**
 - Close of Discovery: **April 14, 2023**
 - Joint Status Report Due: **May 15, 2023**
 - Last Day for Filing Civil Motions Including *Daubert* Motions But Excluding

Motions *In Limine*: June 2, 2023

8. This Motion is made in good faith and not for purposes of delay. The parties are cooperating closely with one another to complete discovery and will continue to do so.

RESPECTFULLY SUBMITTED THIS 26th DAY OF OCTOBER, 2022.

THE CLAIRBORNE FIRM, P.C.

/s/ David J. Utter

William R. Claiborne, Esq.
State Bar No. 126363
David J. Utter, Esq.
State Bar No. 723144
410 East Bay Street
Savannah, Georgia 31401
will@claibornefirm.com
david@claibornefirm.com

COUNTY ATTORNEY FOR
CHATHAM COUNTY

/s/ Andre Pretorius

R. Jonathan Hunt, Esq.
State Bar No. 333692
Andre Pretorius, Esq.
State Bar No. 298154
124 Bull Street
Room 230
Savannah, Georgia 31401
rjhart@chathamcounty.org
anpretorius@chathamcounty.org

SCHREEDER, WHEELER & FLINT, LLP

/s/ Mary Ellen A. Lighthiser

Michael D. Flint, Esq.
State Bar No. 264725
Mary Ellen A. Lighthiser, Esq.
State Bar No. 105407
John A. Christy, Esq.
State Bar No. 125518
1100 Peachtree Street N.E., Suite 800
Atlanta, Georgia 30309-4516
mflint@swfllp.com
mlighthiser@swfllp.com
jchristy@swfllp.com

OLIVER MANER LLP

/s/ William Phillips

Benjamin M. Perkins, Esq.
State Bar No. 140997
Brian D. Griffin, Esq.
State Bar No. 874951
P.O. Box 10180
Savannah, Georgia 31412
bperkins@olivermaner.coim
bgriffin@olivermaner.com

BOUHAN FALLIGANT, LLP

/s/ Gary J. McGinty

CARLTON E. JOYCE
State Bar of Georgia No. 405515
GARY J. MCGINTY
State Bar of Georgia No. 602353
Post Office Box 2139
Savannah, Georgia 31402
cejoyce@bouhan.com
gmcginty@bouhan.com

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this day, a copy of the foregoing document was served upon all counsel of record via the Court's CM/ECF System addressed as follows:

William R. Claiborne, Esq.
David J. Utter, Esq.
The Claiborne Firm, P.C.
410 East Bay Street
Savannah, Georgia 31401
will@claibornefirm.com
david@claibornefirm.com

Christopher J. Murrell, Esq.
Murrell Law Firm
2831 St. Claude Ave.
New Orleans, LA 70117
chris@murell.law

R. Jonathan Hunt, Esq.
Andre Pretorius, Esq.
County Attorney for Chatham County
124 Bull Street
Room 230
Savannah, Georgia 31401
rjhart@chathamcounty.org
anpretorius@chathamcounty.org

Michael D. Flint, Esq.
Mary Ellen A. Lighthiser, Esq.
John A. Christy, Esq.
Schreeder, Wheeler & Flint, LLP
1100 Peachtree Street N.E., Suite 800
Atlanta, Georgia 30309-4516
mflint@swfllp.com
mlighthiser@swfllp.com
jchristy@swfllp.com

Benjamin M. Perkins, Esq.
Brian D. Griffin, Esq.
Oliver Maner LLP
P.O. Box 10180
Savannah, Georgia 31412
bperkins@olivermaner.coim
bgriffin@olivermaner.com

RESPECTFULLY SUBMITTED THIS 26TH DAY OF OCTOBER, 2022.

Post Office Box 2139
Savannah, Georgia 31402
Telephone: 912-236-2491
Telefax: 912-233-0811
Email: cejoyce@bouhan.com
gmcginty@bouhan.com

BOUHAN FALLIGANT, LLP

/s/ Gary J. McGinty
CARLTON E. JOYCE
State Bar of Georgia No. 405515
GARY J. MCGINTY
State Bar of Georgia No. 602353
Attorneys for Defendants
CorrectHealth, LLC, CorrectHealth Chatham
LLC, Carlo Musso, MD; Karen Forchette;
Lowretta Florence; Amber Anderson;
Jacqueline (Jackie) Harned; and Susan
Rivera